

[Parties and Counsel Listed on Signature Pages]

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR-PHK

4:23-cv-05448-YGR

**META AND OREGON AG'S
STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE TO
COMPLETE OREGON 30(b)(6)
DEPOSITION**

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 6-2 and 7-12, Oregon Attorney General (“Oregon AG”) and Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (collectively, “Meta,” and together, the “Parties”), through their undersigned counsel, hereby stipulate as follows:

1. Under the schedule ordered by Magistrate Judge Kang on July 2, 2025, the current deadline for Meta to complete the depositions of witnesses from the State of Oregon (“Oregon”) is August 29, 2025. *See* ECF 2091.

2. On December 13, 2024, Meta served Oregon with a Notice of Deposition pursuant to Federal Rule of Civil Procedure 30(b)(6), and served amended notices on July 21, 2025 and July 29, 2025. Each of these deposition notices requested that Oregon “produce, at least seven (7) business days in advance of the deposition, any and all documents and things in its possession, custody, or control that in any way refer to or concern any of the topics set forth in Schedule A that have not previously been produced to Defendants in this action.”

3. Oregon, individually and through the designated lead counsel for the Attorneys General, objected to these notices several times and engaged in considerable meet and confers regarding them. The Notices were also modified by the Court on multiple occasions.

4. Meta and the Oregon AG worked in good faith to schedule the deposition of Oregon’s 30(b)(6) witness, Oregon Assistant Attorney General Joseph Ferretti, for August 26, 2025.

5. On August 26, 2025, Oregon produced documents to Meta that were collected in response to Meta’s July 29, 2025 Third Amended Notice of Deposition. On August 27, 2025, Oregon produced agency documents that were collected in response to Meta’s August 19, 2025, letter identifying potential deposition exhibits. The parties disagree over whether Meta can appropriately hold open Oregon’s Rule 30(b)(6) deposition to allow for review and questioning about the documents that Oregon produced.

6. To avoid further dispute, and to allow counsel for Oregon time for questioning the witness, if requested, and any responsive questioning by Meta, the parties have agreed to extend the deadline to complete the deposition of Oregon’s 30(b)(6) witness through September 30, 2025, and agree to work together in good faith and seek any further extensions from this court as needed, including any necessary extensions related to a serious medical condition afflicting the spouse of Oregon’s counsel.

7. This Court has previously extended Meta's deadline to complete fact and Rule 30(b)(6) depositions of State witnesses twice. *See* ECF 1696, 2091. This stipulated extension of Meta's deadline to complete the deposition of Oregon's 30(b)(6) witness does not and will not affect any other deadlines already set or that may be set in this action, nor will it affect the deposition time limits already set in ECF 1696, nor any party's or non-party's rights in relation to any other deadlines.

8. Therefore, the Parties agree that the following shall apply:

- a. Subject to the Court's approval, Meta's deadline to complete its deposition of Oregon's 30(b)(6) witness, Assistant Attorney General Joseph Ferretti, shall be extended through and including September 30, 2025.
- b. The Oregon AG reserves all rights related to Oregon's Rule 30(b)(6) deposition. This agreement does not constitute a waiver of any objections the Oregon AG has or may raise with respect to the deposition, nor does it alter any requirements or limitations imposed on this deposition by previous court orders, aside from the deadline for completion of such deposition.
- c. Meta reserves all rights related to Oregon's Rule 30(b)(6) deposition, including without limitation the right to dispute any objections that the Oregon AG may raise.

Respectfully submitted,

DATED: August 29, 2025

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By: /s/ Ashley M. Simonsen

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ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: August 29, 2025

By: /s/ Ashley M. Simonsen
Ashley M. Simonsen

[PROPOSED] ORDER

By agreement of the Parties, and for good cause shown, **IT IS SO ORDERED.**

Dated: _____, 2025

Magistrate Judge Hon. Peter H. Kang